

1 PHILLIP A. TALBERT
2 Acting United States Attorney
3 KEVIN C. KHASIGIAN
4 Assistant U. S. Attorney
5 501 I Street, Suite 10-100
Sacramento, CA 95814
Telephone: (916) 554-2700
6
7 Attorneys for the United States

8
9 IN THE UNITED STATES DISTRICT COURT
10
11 EASTERN DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 APPROXIMATELY \$48,500.00 IN U.S.
CURRENCY,

16 Defendant.

2:21-MC-00012-MCE-DB

STIPULATION AND ORDER EXTENDING TIME
FOR FILING A COMPLAINT FOR FORFEITURE
AND/OR TO OBTAIN AN INDICTMENT
ALLEGING FORFEITURE

17 It is hereby stipulated by and between the United States of America and potential claimants

18 Xiaobing Wang, Min Guo, and Lianfeng Li, (“claimants”), by and through their respective counsel as
19 follows:

20 1. On or about September 23, 2020, the Homeland Security Investigations seized the above-
21 referenced defendant asset pursuant to a State search and seizure warrant (hereafter “defendant asset”).

22 2. Under 18 U.S.C. §§ 983(a)(1)(A)(i)-(iv), and 983(a)(3)(A), the United States is required
23 to send notice to potential claimants, file a complaint for forfeiture against the defendant currency, or
24 obtain an indictment alleging that the defendant currency is subject to forfeiture within ninety days of
25 seizure, unless the court extends the deadline for good cause shown or by agreement of the parties. That
26 deadline was January 20, 2021.

27 3. By Stipulation and Order filed January 22, 2021, the parties stipulated to extend to April
28 20, 2021, the time in which the United States is required to file a civil complaint for forfeiture against

1 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
2 forfeiture.

3 4. By Stipulation and Order filed April 28, 2021, the parties stipulated to extend to June 18,
4 2021, the time in which the United States is required to file a civil complaint for forfeiture against the
5 defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
6 forfeiture.

7 5. By Stipulation and Order filed June 21, 2021, the parties stipulated to extend to August
8 17, 2021, the time in which the United States is required to file a civil complaint for forfeiture against
9 the defendant currency and/or to obtain an indictment alleging that the defendant currency is subject to
10 forfeiture.

11 6. By Stipulation and Order filed August 17, 2021, the parties stipulated to extend to
12 October 18, 2021, the time in which the United States is required to file a civil complaint for forfeiture
13 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
14 subject to forfeiture.

15 7. By Stipulation and Order filed October 22, 2021, the parties stipulated to extend to
16 December 17, 2021, the time in which the United States is required to file a civil complaint for forfeiture
17 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
18 subject to forfeiture.

19 8. As provided in 18 U.S.C. § 983(a)(3)(A), the parties wish by agreement to extend to
20 February 15, 2022, the time in which the United States is required to file a civil complaint for forfeiture
21 against the defendant currency and/or to obtain an indictment alleging that the defendant currency is
22 subject to forfeiture.

23 ///

24 ///

25 ///

26 ///

27 ///

28 ///

1 9. Accordingly, the parties agree that the deadline by which the United States shall be
2 required to file a complaint for forfeiture against the defendant currency and/or to obtain an indictment
3 alleging that the defendant currency is subject to forfeiture shall be extended to February 15, 2022.

4 Dated: 12/17/2021

PHILLIP A. TALBERT
Acting United States Attorney

6 By: /s/ Kevin C. Khasigian
7 KEVIN C. KHASIGIAN
Assistant U.S. Attorney

9 Dated: 12/17/2021

10 /s/ Mark J. Reichel
11 MARK J. REICHEL
12 Attorney for Potential Claimants
Xiaobing Wang, Min Guo, and Lianfeng Li
(Signature authorized by email)

13 IT IS SO ORDERED.

14 Dated: December 22, 2021

15 
16 MORRISON C. ENGLAND, JR.
17 SENIOR UNITED STATES DISTRICT JUDGE